

To: Kelley, Anna[Anna.Kelley@hamilton-co.org]
From: McGrath, Jesse
Sent: Thur 11/6/2014 9:43:34 PM
Subject: RE: Precision and Bias Checks

I had called and had left a voice message so that's why it's missing. I asked if he advocates invalidating solely because of 1-pt checks i.e. in the absence of a known issue with the monitor.

His response after this email is an emphatic yes. I won't copy it since it has information about other agencies in it. But the gist of his argument is that because it's a critical criterion and because the Handbook says invalidate you must invalidate.

He doesn't seem to distinguish between instances where there is a known problem or not.

His argument about not invalidating for CV or PEP etc. is based solely on them not being critical criteria.

I'm going to schedule some time to talk to him to get a clearer understanding from him and to be clear myself that I'm not advocating *allowing* people to keep getting questionable data.

From: Kelley, Anna [mailto:Anna.Kelley@hamilton-co.org]
Sent: Thursday, November 06, 2014 12:11 PM
To: McGrath, Jesse
Subject: RE: Precision and Bias Checks

Good luck.

You didn't include your specific question(s) to Mike.

anna

From: McGrath, Jesse [mailto:mcgrath.jesse@epa.gov]

Sent: Thursday, November 06, 2014 11:56 AM
To: Kelley, Anna
Subject: FW: Precision and Bias Checks

Looks like Mike takes the strict interpretation.

I'll have to talk to him on the phone later. I've been suddenly asked to present this concept.

From: Papp, Michael
Sent: Thursday, November 06, 2014 5:53 AM
To: McGrath, Jesse
Subject: Precision and Bias Checks

From the validation template

*Observations that do not meet each and every criterion on the **Critical Criteria Table** should be invalidated unless there are compelling reason and justification for not doing so. The sample or group of samples for which one or more of these criteria are not met is invalid until proven otherwise. The cause of not operating in the acceptable range for each of the violated criteria must be investigated and minimized to reduce the likelihood that additional samples will be invalidated.*

Any check listed as critical should be invalidated back to the last acceptable check. We may allow one check that just over the acceptance limit in but that's up to you.

The requirements are pretty clear. Some have abused this and now are paying the price.

Now there are other precision check (Like PM2.5 collocation) that represent a grander scale of precision for the PQAO that is not critical but operational. In this case you have more leeway to trouble shoot to determine issues.

A failure of an NPAP audit by itself would not be cause for invalidation but further follow-up.
Hope this helps.

Mike Papp

EPA

Office of Air Quality Planning and Standards

Ambient Air Monitoring Group

Research Triangle Park, NC

919-541-2408

